

August 10, 2021

Mark Schneider
Director of the Institute of Education Sciences
U.S. Department of Education
400 Maryland Ave. SW
Washington, DC 20202

Re: Comments from GLSEN regarding Agency Information Collection Activities: National Study to Inform the 21st Century Community Learning Centers Program [Docket ID ED-2021-SCC-0086]

Dear Dr. Schneider:

I write to you on behalf of GLSEN, the nation's leading organization on lesbian, gay, bisexual, transgender, queer, nonbinary, gender non-conforming, and intersex (LGBTQ+) issues in K-12 education, regarding the Secretary's proposed priorities and definitions for discretionary grant programs. GLSEN's Research Institute was the first to regularly conduct nationally representative surveys of LGBTQ+ students, having launched our biannual National School Climate Survey in 1999.

Programs, sports, and other extracurricular activities available during non-school hours all have demonstrated academic and well-being benefits.¹ LGBTQ+ students who experience societal stigma, unwelcoming homes, or who are homeless² may gain access to critical supports that foster resilience and well-being through LGBTQ+ inclusive extracurricular programming during non-school hours.³

Unfortunately, LGBTQ+ students are less likely to participate, and often face harassment in extracurricular activities and programs. LGBTQ+ students are half as likely to participate in athletic-related activities as their non-LGBTQ+ peers.⁴ According to GLSEN's 2019 National School Climate Survey, many LGBTQ+ students (71.8%) reported avoiding extracurricular activities to some extent because they felt unsafe or uncomfortable, and over a quarter avoided them often or frequently (25.9%).⁵ Transgender students commonly experience discriminatory policies or practices around school locker rooms: 55.5% reported being prevented from using the locker room that aligns with their gender.⁶ Transgender students were also

¹ See e.g., U.S. Office of the Assistant Secretary for Health, *The National Youth Sports Strategy* (2019), https://health.gov/sites/default/files/2019-10/National_Youth_Sports_Strategy.pdf.

² LGBTQ+ youth are overrepresented among homeless youth, accounting for up to 40% of the population. See: Soon Kyu Choi, Bianca D.M. Wilson, Jama Shelton, and Gary Gates, *Serving Our Youth 2015: The Needs and Experiences of Lesbian, Gay, Bisexual, Transgender, and Questioning Youth Experiencing Homelessness* (Los Angeles: The Williams Institute with True Colors Fund, 2015). <https://truecolorsunited.org/portfolio/serving-our-youth/>.

³ For example, in one survey of homeless students, 62% rated after- or before-school programs and activities as very important for staying in and succeeding at school. See: Erin S. Ingram, John M. Bridgeland, Bruce Reed, and Matthew Atwell. "Hidden in Plain Sight: Homeless Students in America's Public Schools," Civic Enterprises (2017). Available at <https://files.eric.ed.gov/fulltext/ED572753.pdf>. See also: V. Paul Poteat, Jillian R. Scheer, and Ethan H. Mereish, "Factors affecting academic achievement among sexual minority and gender-variant youth," *Advances in child development and behavior* 47 (2014): 261-300.

⁴ 15.9% of LGBTQ+ students participated in intramural sports, compared to 35.8% of cisgender, heterosexual students, and 19.2% of LGBTQ+ students participated in interscholastic sports, compared to 40.2% of cisgender, heterosexual students. See: Emily A. Greytak, Joseph G. Kosciw, Christian Villenas, and Noreen M. Giga, *From Teasing to Torment: School Climate Revisited, A Survey of U.S. Secondary School Students and Teachers* (New York: GLSEN, 2016). https://www.glsen.org/sites/default/files/2019-12/From_Teasing_to_Torment_Revised_2016.pdf. See also: U.S. Office of the Assistant Secretary for Health, *The National Youth Sports Strategy*, pp. 35, 51.

The Trevor Project, "LGBTQ Youth Sports Participation" (2020). <https://www.thetrevorproject.org/wp-content/uploads/2020/06/June-2020-Brief-LGBTQ-Youth-Sports-Participation-Research-Brief.pdf>.

Human Rights Campaign, "Play to Win: Improving the Lives of LGBTQ Youth in Sports" (2018). <https://www.hrc.org/resources/play-to-win-improving-the-lives-of-lgbtq-youth-in-sports>.

⁵ Joseph G. Kosciw, Caitlin M. Clark, Nhan L. Truong, and Adrian D. Zongrone, *The 2019 National School Climate Survey: The Experiences of Lesbian, Gay, Bisexual, Transgender, and Queer Youth in Our Nation's Schools* (New York: GLSEN, 2020), p. 18. Available at <https://www.glsen.org/research/2019-national-school-climate-survey>.

⁶ Kosciw et al., *The 2019 National School Climate Survey*, p. 100.

more likely than their cisgender peers to report that they avoided school locker rooms because they felt unsafe or uncomfortable.⁷

Among elementary school students, GLSEN found that nearly one in ten (8%) report that they do not conform to traditional gender norms, i.e., that they are a boy who others sometimes think act or look like a girl, or they are a girl who others sometimes think act or look like a boy.⁸ Gender non-conforming students are more likely than other students to experience incidents of bullying or name-calling school and to feel less safe at school. These harmful dynamics among elementary school students may be replicated in programs and activities that take place outside normal school hours. At the same time, such programs and activities can be important sites for preventing bullying through programming that promotes healthy social and emotional learning (SEL).

President Biden’s recent Executive Orders—including those on racial equity and underserved communities, implementing the landmark *Bostock* ruling, and advancing gender equity and equality—collectively call for an “ambitious whole-of-government equity agenda.”⁹ Given this, we urge the Institute of Education Sciences (IES) to revise its proposed collection to incorporate questions that speak to the equity needs and experiences of marginalized student groups, including LGBTQ+ students, students of color, and students with disabilities.

Recommended Amendments to Program Staff Survey

GLSEN strongly supports the inclusion of voluntary demographic questions D8, D9, and D10 on program staffs’ race/ethnicity and gender identity. GLSEN does however urge IES to amend the question on gender identity by replacing “Other gender” with “Another gender identity.” This alternative language is more inclusive and avoids othering those who do not identify with the listed options, such as those who identify Two Spirit.¹⁰

Additionally, GLSEN urges IES to add the following voluntary demographic question about sexual orientation:

D11: What is your sexual orientation? MARK ALL THAT APPLY

Heterosexual / Straight

Gay

Lesbian

Bisexual

Queer

Another sexual orientation (please specify) _____

Prefer not to answer

⁷ Kosciw et al., *The 2019 National School Climate Survey*, p. 94.

⁸ GLSEN and Harris Interactive, *Playgrounds and Prejudice: Elementary School Climate in the United States, A Survey of Students and Teachers* (New York: GLSEN, 2012). <https://www.glsen.org/research/playgrounds-and-prejudice-lgbtq-issues-elementary-schools>.

⁹ Executive Order 13985 of January 20, 2021 (Advancing Racial Equity and Support for Underserved Communities Through the Federal Government). 86 Fed. Reg. §14 (January 25, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01753.pdf>.
Executive Order 13988 of January 20, 2021 (Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation). 86 Fed. Reg. §14 (January 25, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01761.pdf>.

Executive Order 14021 of March 8, 2021 (Guaranteeing an Educational Environment Free From Discrimination on the Basis of Sex, Including Sexual Orientation or Gender Identity). 86 Fed. Reg. §46 (March 11, 2021). <https://www.govinfo.gov/content/pkg/FR-2021-03-11/pdf/2021-05200.pdf>.

¹⁰ Edmo, Se-ah-dom and Aaron Ridings, editors. *Tribal Equity Toolkit 3.0: Tribal Resolutions and Codes to Support Two Spirit & LGBT Justice in Indian Country* (2017). <https://www.thetaskforce.org/tribal-equity-toolkit-3-0/>.

Katherine Davis-Young, “For many Native Americans, embracing LGBT members is a return to the past,” March 29, 2019, *Washington Post*. https://www.washingtonpost.com/national/for-many-native-americans-embracing-lgbt-members-is-a-return-to-the-past/2019/03/29/24d1e6c6-4f2c-11e9-88a1-ed346f0ec94f_story.html.

Adding the above question will assist, along with already included demographic questions, in identifying disparities among those who are serving in these roles that matter for 21st CCLC program evaluation. As the Department of Education has recognized,¹¹ educators from marginalized backgrounds may be uniquely prepared to advance educational equity for marginalized students, while benefiting all students by preparing them to live and work in a diverse society.

GLSEN appreciates and supports IES’s interest in the implementation and effectiveness of a system focused on improving staff practices that promote students’ social and emotional skills, and the inclusion of questions that address staff preparedness in this area. To advance equity in afterschool programs, SEL considerations for marginalized students—including LGBTQ+ students, students of color, students with disabilities—must include an understanding of the societal biases that these populations face, discriminatory policies or practice that they commonly experience, and traumatic experiences they are more likely to endure.¹² Anecdotally, we know that some state education agencies are ensuring that 21st CCLC staff have access to professional development on fostering LGBTQ+ inclusive afterschool programs. Wisconsin’s Department of Public Instruction used a portion of its funding under ESEA during the 2019-2020 school year to facilitate trainings for recipients of Title IV-B grants on “social and emotional learning, best-practice strategies on working with lesbian, gay, bisexual, transgender, and questioning (LGBTQ) youth, and creating positive environments in after school settings.”¹³

GLSEN urges IES to add the following subquestions to the list under B2: “During the [2021-2022 or 2022-2023] school year, as part of your work for your afterschool center, which of the following specific practices for promoting students’ social and emotional skills were the subject of any training you received, and which practices were the subject of any coaching you received?”

- B2(n) Understanding and respecting people from diverse racial and ethnic backgrounds.*
- B2(o) Understanding and respecting people of diverse sexual orientations.*
- B2(p) Understanding and respecting people of diverse gender identities.*
- B2(q) Understanding and respecting students with disabilities or differently abled people.*
- B2(r) Understanding and respecting students with diverse family backgrounds.*

Adding the above questions will enable IES to better evaluate the preparedness of 21st CCLC program staff to support equitable conditions of learning for marginalized students.

¹¹ Proposed Priorities- Effective Educator Development Division Programs, 86 Fed. Reg. §74 (April 20, 2021), <https://www.federalregister.gov/documents/2021/04/20/2021-08193/proposed-priorities-effective-educator-development-division-programs>. Proposed Priorities and Definitions-Secretary's Supplemental Priorities and Definitions for Discretionary Grants Programs, 86 Fed. Reg. §123 (June 30, 2021), <https://www.govinfo.gov/content/pkg/FR-2021-06-30/pdf/2021-14003.pdf>.

¹² Students may be impacted by traumatic experiences at home as well as at school and LGBTQ+ students experience trauma at higher rates than their non-LGBTQ+ peers. LGBTQ+ students often face particular forms of childhood trauma simply for being who they are, including being targeted for bullying and harassment, subject to societal stigma and biases, and experiencing rejection from family members, peers, and institutions.

See, e.g.: The National Child Traumatic Stress Network (2015). LBGTQ Issues and Child Trauma. <https://www.nctsn.org/resources/lgbtq-issues-and-child-trauma>.

The National Resource Center for Mental Health Promotion and Youth Violence Prevention, “Adopting a Trauma-Informed Approach for LGBTQ Youth-Part 1: Why Use a Trauma-Informed Approach With LGBTQ Youth?” https://healthysafechildren.org/sites/default/files/Trauma_Informed_Approach_LGBTQ_Youth_1.pdf.

¹³ Wisconsin Department of Public Instruction & University of Wisconsin-Green Bay Consortium of Applied Research, “21st Century Community Learning Centers 2018-19 Annual Report” (2019). https://dpi.wi.gov/sites/default/files/imce/sspw/pdf/DPI-Annual-Report-2018-19-Low_Res_version_for_website.pdf (Accessed March 4, 2021).

Recommended Amendments to Program Directors Survey

IES is not currently proposing to collect demographic data from program directors. GLSEN urges IES to add the voluntary demographic questions (D8-D10) from the program staff survey to the program director survey, including the revised question D8 on gender identity and the new question D11 on sexual orientation proposed above. Adding demographic questions will assist in identifying disparities, if any, in who is serving in program directors roles that are relevant in evaluation 21st CCLC programs and might inform Department of Education priorities for educator development and other federal grant programs.

Program Directors may be responsible for facilitating trainings to program staff or evaluating and selecting appropriate trainings. For this reason, GLSEN urges IES to add the following subquestions to the list under B16(c): “During the 2021–2022 school year, on which of the following topics did you or other staff at your center receive training as part of working for your afterschool center?”

- B16(c)(8)(i) Understanding and respecting people from different racial and ethnic backgrounds.*
- B16(c)(8)(ii) Understanding and respecting people of diverse sexual orientations.*
- B16(c)(8)(iii) Understanding and respecting people of diverse gender identities.*
- B16(c)(8)(iv) Understanding and respecting students with disabilities or differently abled people.*
- B16(c)(8)(v) Understanding and respecting students with diverse family backgrounds.*

Adding the above questions will enable IES to better understand the preparedness of 21st CCLC program directors to support equitable conditions of learning for marginalized students.

Recommended Amendments to Student Survey

Unfortunately, bullying and name-calling based on personal characteristics such as race and gender identity is not uncommon among elementary school students, the population being surveyed in this study. In a nationally representative survey, GLSEN found:

- Nearly half of students (46%) reported that they hear comments like “that’s so gay” or “you’re so gay” from other kids at school with some regularity, with one-fifth (21%) saying that it happens all the time or often.¹⁴
- More than half of elementary school students (51%) say that students reported hearing biased remarks about a student’s intellectual abilities (e.g., “retard” or “spaz”) at least sometimes, with one in five saying that it happens all the time or often (21%).¹⁵
- Students who do not conform to traditional gender roles are more likely than others to say they are called names, made fun of, or bullied at least sometimes at school (56% vs. 33%), and twice as likely as other students to say that other kids at school have spread mean rumors or lies about them (43% vs. 20%).¹⁶
- Black/African American students are more likely to say they are called names, made fun of, or bullied at least sometimes because of their race than White students (11% vs. 2%) and are far more likely than White students to report being bullied because of the way they look (48% vs. 29%).¹⁷
- Students who are bullied at least sometimes are less likely than others to say that they get good grades (57% vs. 71%), less likely to report that they have been happy at school this year (34% vs.

¹⁴ GLSEN and Harris Interactive, *Playgrounds and Prejudice*, p. 3.

¹⁵ GLSEN and Harris Interactive, *Playgrounds and Prejudice*, p. 3.

¹⁶ GLSEN and Harris Interactive, *Playgrounds and Prejudice*, p. 45.

¹⁷ GLSEN and Harris Interactive, *Playgrounds and Prejudice*, p. 44.

69%), and are more likely to say that they sometimes do not want to go to school because they feel afraid or unsafe there (33% vs. 8%).¹⁸

SEL assessment should include questions for students about getting along with people who are different from them because of their race, gender, gender expression, ability, or family background. Because the proposed student survey uses proprietary survey questions, GLSEN is unable to ascertain whether IES includes these questions and propose question language if such questions are not currently included. GLSEN's Research Institute can be a resource should IES need assistance formulating new questions.

Additionally, IES is not currently proposing to collect demographic data from students. Disaggregating data in K-12 learning communities by student subgroups inclusive of marginalized student groups has been a crucial tool for identifying disparities and evaluating areas for continued improvement. While IES may plan to obtain such information from student records, this data can be incomplete. For this reason, GLSEN urges IES to add the following voluntary demographic questions to its survey of 21st CCLC participating students in Grades 3-5:

F1: Are you a...

- Boy*
- Girl*
- Another gender (How would you describe yourself?) _____*
- Prefer not to answer*

F2. D9. Are you of Hispanic or Latino?

- Yes*
- No*

F3. What is your race? YOU CAN MARK ONE OR MORE RACES

- White*
- Black or African American*
- Asian*
- Native Hawaiian or other Pacific Islander*
- American Indian or Alaska Native*

As IES proposes a national study we do not anticipate privacy concerns in collecting this data, however, if any of IES's analysis is disaggregated by district or school level, we would recommend not disaggregating by gender identity and any demographic category that could be identifying.

We thank you for considering these comments and recommendations. To discuss GLSEN's recommendations, please contact Aaron Ridings at 202-621-5815 or aaron.ridings@glsen.org.

Sincerely,

Aaron Ridings, MPA
Interim Chief of Staff
Director of Public Policy

Joseph Kosciw, Ph.D.
Director of Research

¹⁸ GLSEN and Harris Interactive, *Playgrounds and Prejudice*, p. xvii.